

Richard S. Mills, Esq. (RM-0206)
John P. Cookson, Esq. (JPC-9391)
McElroy, Deutsch, Mulvaney & Carpenter, LLP
Wall Street Plaza
88 Pine Street, 24th Floor
New York, New York 10005
(212) 483.9490
Attorneys for Defendant
Moody's Holdings, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE
LITIGATION

MIQUEL SANTANA,

Plaintiff,

-against-

100 CHURCH, LLC, et. al.,

Defendants.

21 MC 102 (AKH)

INDEX NO.: 07-CV-1700 (AKH)

**NOTICE OF ADOPTION OF MOODY'S
HOLDINGS, INC.'S ANSWER
TO MASTER COMPLAINT**

ELECTRONICALLY FILED

PLEASE TAKE NOTICE that Defendant, MOODY'S HOLDINGS, INC., by its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, as and for its Response to the allegations set forth in the Amended Complaint by Adoption (Amended Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Answer to Master Complaint dated August 2, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, MOODY'S HOLDINGS, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
February 01, 2008

Yours etc.,

McElroy, Deutsch, Mulvaney & Carpenter, LLP
Attorneys for Defendant
Moody's Holdings, Inc.

By: 

Richard S. Mills (RM-0206)
John P. Cookson (JPC-9391)
Wall Street Plaza
88 Pine Street, 24th Floor
New York, New York 10005
(212) 483.9490

TO: Worby Groner Edelman & Napoli Bern, LLP
115 Broadway, 12th Floor
New York, New York 10006
(212) 267.3700

Gregory J. Cannata, Esq.
Robert A. Grochow, Esq.
233 Broadway, 5th Floor
New York, New York 10279
(212) 553.9206

James E. Tyrrell, Jr., Esq.
Patton Boggs LLP
One Riverfront Plaza
Newark, New Jersey 07102
(973) 848.5600

Thomas A. Egan, Esq.
Fleming Zulack Williamson Zauderer, LLP
One Liberty Plaza
New York, New York 10006-1404
(212) 412.9500

CERTIFICATION OF SERVICE

I hereby certify that on the 1st day of February 2008, I electronically filed the foregoing NOTICE OF ADOPTION OF ANSWER BY DEFENDANT MOODY'S HOLDING, INC., with the Clerk of the Court using the CM/ECF System which sends notification to appearing parties.

McElroy, Deutsch, Mulvaney & Carpenter LLP

By: 

Richard S. Mills (RM-0206)
John P. Cookson (JPC-9391)
Attorney for Defendant
MOODY'S HOLDINGS, INC.
Wall Street Plaza
88 Pine Street, 24th Floor
New York, New York 10005
(212) 483-9490